from Mark Allen 4/11/79

Dear Arnold,

Enclosed is a memo I hurriedly cooked up during Spring Break. I hope you have time took a close look at it and would appreciate your comments.

I am now preparing my appeal brief which will not be what I had hoped because of upcoming exam pressures. I have 5 grounds of appeal

1. use of a vacated order as precedent
2. failure to allow discovery
3. failure of Agency to show these were no segregable portions
4. excessive weight given to the agency affidavit
5. failure of the court to provide the explanation required in Vaughan and Mead

I'll need to talk to Jim before I finish, especially on the problem of what relief to ask for.

(OVER)